

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON
HAMMONDS, BRENDA F. WATKINS,
LIMESTONE UNIVERSITY, MG
FREESITES, LTD. d/b/a
PORNHUB.COM, MG FREESITES II
LTD., MINDGEEK S.A.R.L., MINDGEEK
USA, INC., MG BILLING LTD., and
HAMMY MEDIA LTD. d/b/a
XHAMSTER.COM, TRAFFICSTARS
LTD., WISEBITS LTD, XHAMSTER IP
HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947-DCC

HAMMY MEDIA, LTD. d/b/a XHAMSTER.COM'S
ANSWERS TO INTERROGATORIES

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Hammy Media d/b/a xHamster.com ("Hammy") hereby responds to Plaintiffs' First Set of Interrogatories.

ANSWERS TO INTERROGATORIES

INTERROGATORY 1: Please identify and discuss, in detail, the algorithm used for presenting content to users of xHamster.com and how content on the website is disseminated. This includes, but is not limited to, the names, contact information, and addresses of all the individuals responsible for developing and designing the algorithm utilized by xHamster.com.

OBJECTION: Hammy objects to this interrogatory as being overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible information. Additionally,

Hammy objects to the request to provide names and contact information for individuals who live and work outside of the United States, as this request is designed to harass individuals who are not part of this lawsuit and are outside of the jurisdiction of the United States courts. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2020. Subject to this objections, Hammy states as follows.

ANSWER:

Regarding the algorithm used for presenting content to users of the website www.xhamster.com (hereinafter “the Platform”) (and how content is disseminated among the users of the website), which may be referred to as "recommendation system" in 2019-2020:

The Platform used a recommendation system to offer users a personalized (if registered user or if cookie/prior search information was available on the user’s computer) and non-personalized experience, and thus make navigation on the Platform easier and more convenient. Recommendation system suggested content based on user preferences as expressed through previous interactions made by the user on the Platform, such as following a channel or person, or history of viewing content. Interaction of a user with the Platform was an indicator that helped the recommendation system to predict content that the user is likely to be interested in as well as the content in which the user may be less interested and may prefer not to watch.

The recommendation system was based on different factors, including without limitation:

- User interactions: the videos the user likes/dislikes, adds to the favorites, comments, video watching time, persons or channels the user follows.

- Video information: tags, category, and number of video views
- User information: language preference and country location of the user.

Randomly, the algorithm also sometimes presented videos in a chronological (based on the date and time of the video was first uploaded to our system) order.

INTEROGATORY 2: Please identify and discuss, in detail, the content curation process for xHamster.com; including, but not limited to, the names, contact information, and addresses of all the employees responsible for content curation during the period contained within the Complaint, during the present, and any employees that were working during the time and no longer work for xHamster.com.

OBJECTION: Hammy objects to this interrogatory as being overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible information. Additionally, Hammy objects to the request to provide names and contact information for individuals who live and work outside of the United States, as this request is designed to harass individuals who are not part of this lawsuit and are outside of the jurisdiction of the United States courts. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2023. Subject to this objections, Hammy states as follows.

ANSWER:

The curation process can be viewed in two different ways:

First, it is possible to think of the curation process as a way of storing, distributing and viewing videos in a convenient, secure and fast way to the users. Considering curation in this manner:

All videos uploaded to the Platform were stored on internal and/or rented storage (servers) across different data centers located in the European Union. Videos that undergo moderation and become publicly available on the platform were then made available for users via third-party service providers, who provide the Content Delivery Networks (CDNs) services to the platform. The platform does not provide CDN services and does not operate any entity that provides such services.

Currently, only uploaders who went through the LIVE identity verification procedure and provided all necessary and legally required documents with regard to the videos they are planning to publish and participants in such videos (namely, ID's of the uploader, ID's of all participants and model release agreements for each participant in the video) are allowed to upload videos to the website. Currently, before becoming publicly available videos undergo the following stages:

- 1) Preliminary conversion and thumbnail generation (required for moderation) - those are stored within the internal storage mentioned above;
- 2) Video moderation followed by either the publication of the video, or its removal (rejection);
- 3) Additional video fingerprinting (after publication or deletion and rejection) is performed to detect digital content rights violations and content duplicates.

On the other hand, it is also possible to think about the curation process as being how videos are given categories, titles and descriptions on the platform. Thinking about curation in this manner, videos currently undergo two different stages the upload stage and moderation stage. Both are described below.

I. Upload stage:

1. When the video is uploaded to the platform, the uploader (during the upload stage) chooses the title, category and description for such video.
2. The automatic tagging system suggests to the uploader certain tags. The automatic tagging system on the platform is based on information provided by the uploader in the description and name of the video. The tag assignment is not random, but based on the title, description, and category specified by the uploader.
3. Titles, descriptions, categories, and tags are assigned to each video by the corresponding uploader, the platform does not participate in this process.
4. After the upload stage, the video goes to the moderation stage.

II. Moderation stage:

1. The moderation team checks the titles and descriptions of the videos uploaded to verify that they do not contain any restricted words as identified by the moderation process in accordance with the internal instructions of the company.
2. The moderation team does not review categories and tags, as it is the uploader's choice and responsibility to select the exact categories and tags for a specific video. All of the categories available for these purposes are predefined by the company and checked in advance (when the full list was created).
3. When the categories and tags for a video are selected by the uploader, they are automatically assigned to the video and users can find the video (among other videos with similar tags or categories) on the platform by those specific categories and tags once the video is published.

4. On a case-by-case basis (for example, when a user report is received), the company reserves the right to change the categories and tags of the video manually or automatically using moderation team efforts.

INTEROGATORY 3: Please identify and discuss, in detail, the various business purposes of each and every website operated by Hammy Media LTD, to include a list of all IP addresses of websites currently held by the company, and which entities said IP is related to.

OBJECTION: Hammy objects to this interrogatory as being overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible information. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2023. Subject to this objections, Hammy states as follows.

ANSWER: Hammy owns and operates xHamster.com.

Hammy only operates the xHamster.com website, which is an entertainment and recreational video-sharing platform of the adult nature.

There is no technical possibility to provide a list of IP addresses used by the xHamster.com website in 2019-2020. Currently, Hammy utilizes the following IP addresses (the list is current as of 28 December 2023):

88.208.60.136/32

88.208.29.180/32

185.207.236.1/32

185.207.236.128/32

185.207.236.27/32

185.207.236.154/32

185.207.236.28/32

185.207.236.155/32

185.207.236.29/32

185.207.236.156/32
185.207.236.2/32
185.207.236.129/32
185.207.236.3/32
185.207.236.130/32
185.207.236.18/32
185.207.236.145/32
185.207.236.5/32
185.207.236.132/32
185.207.236.6/32
185.207.236.133/32
185.207.236.8/32
185.207.236.135/32
185.207.236.9/32
185.207.236.136/32
185.207.236.10/32
185.207.236.137/32
185.207.236.11/32
185.207.236.138/32
185.207.236.12/32
185.207.236.139/32
185.207.236.13/32
185.207.236.140/32
185.207.236.14/32
185.207.236.141/32
185.207.236.15/32
185.207.236.142/32
185.207.236.16/32
185.207.236.143/32
185.207.236.17/32
185.207.236.144/32

185.207.236.19/32
185.207.236.146/32
185.207.236.20/32
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185.207.236.160/32
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185.207.236.126/32
185.207.236.252/32
185.207.236.125/32

185.207.236.251/32

185.207.236.120/32

185.207.236.246/32

185.207.236.117/32

185.207.236.243/32

185.207.236.102/32

185.207.236.228/32

185.207.236.81/32

185.207.236.207/32

185.207.236.74/32

185.207.236.200/32

185.207.236.73/32

185.207.236.199/32

185.207.236.67/32

185.207.236.193/32

185.207.236.64/32

185.207.236.190/32

185.207.236.57/32

185.207.236.183/32

185.207.236.54/32

185.207.236.180/32

185.207.236.48/32

185.207.236.174/32

185.207.236.37/32

45.144.149.5/32

45.144.149.62/32

45.144.149.67/32

45.144.149.118/32

45.144.149.144/32

45.144.149.132/32

45.144.149.120/32

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45.144.149.123/32
45.144.149.147/32
45.144.149.156/32
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185.207.236.237/32
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45.144.149.146/32
45.144.149.158/32
45.144.149.125/32
45.144.149.119/32
45.144.149.148/32
185.207.236.106/32
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185.207.236.226/32
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185.207.236.224/32
185.207.236.97/32
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185.207.236.231/32

185.207.236.103/32

185.207.236.229/32

185.207.236.101/32

185.207.236.227/32

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45.144.149.47/32

185.207.236.86/32

185.207.236.212/32

45.144.149.25/32

45.144.149.99/32

45.144.149.102/32

45.144.149.105/32

45.144.149.107/32

45.144.149.143/32

45.144.149.114/32

45.144.149.157/32

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185.207.236.187/32
185.207.236.60/32
185.207.236.186/32
185.207.236.59/32
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45.144.149.82/32
45.144.149.83/32
45.144.149.84/32
45.144.149.87/32
45.144.149.90/32
45.144.149.91/32
45.144.149.94/32
45.144.149.95/32
45.144.149.128/32
185.207.236.82/32
185.207.236.208/32
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45.144.149.32/32

45.144.149.121/32
185.207.236.56/32
185.207.236.182/32
185.207.236.55/32
185.207.236.181/32
185.207.236.53/32
185.207.236.179/32
185.207.236.52/32
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185.207.236.177/32
185.207.236.50/32
185.207.236.176/32
185.207.236.49/32
185.207.236.175/32
185.207.236.47/32
185.207.236.173/32
185.207.236.46/32
185.207.236.172/32
185.207.236.45/32
185.207.236.171/32
185.207.236.44/32
185.207.236.170/32
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185.207.236.166/32

185.207.236.39/32

185.207.236.165/32

45.144.149.74/32

45.144.149.116/32

45.144.149.134/32

45.144.149.117/32

45.144.149.39/32

45.144.149.17/32

45.144.149.13/32

45.144.149.7/32

45.144.149.16/32

185.207.236.127/32

185.207.236.253/32

185.207.236.119/32

185.207.236.245/32

185.207.236.108/32

185.207.236.234/32

88.208.18.30/32

88.208.29.24/32

88.208.18.126/32

88.208.18.127/32

88.208.5.208/32

88.208.5.209/32

2a02:b49:4:8:c55:fafa:5c:1/128

2a02:b48:4000:d:9ac:ce3:0:1/128

2a02:b49:4:8:9ac:ce3:0:1/128

2a02:b48:4000:d:63::b/128

2a02:b49:4:8:63::b/128

2a02:b48:4000:d:0:108:99:ed1a/128

2a02:b49:4:8:0:108:99:ed1a/128

2a02:b48:4000:d::5e72:51fe/128

2a02:b49:4:8::5e72:51fe/128
2a02:b48:4000:d:0:5ac5:eb10:b10/128
2a02:b49:4:8:0:5ac5:eb10:b10/128
2a02:b48:4000:d::550:168/128
2a02:b49:4:8::550:168/128
2a02:b48:4000:d:aaaa:ffff:0:2/128
2a02:b49:4:8:aaaa:ffff:0:2/128
2a02:b48:4000:d:0:8f99:1c09:facf/128
2a02:b49:4:8:0:8f99:1c09:facf/128
2a02:b48:4000:d:0:4b77:9fb:f71/128
2a02:b49:4:8:0:4b77:9fb:f71/128
2a02:b48:4000:d::d59:b10/128
2a02:b49:4:8::d59:b10/128
2a02:b48:4000:d:a995:0:1d:c10d/128
2a02:b49:4:8:a995:0:1d:c10d/128
2a02:b48:4000:d:a995:0:dee5:41/128
2a02:b49:4:8:a995:0:dee5:41/128
2a02:b48:4000:d:a995:0:a1:759/128
2a02:b49:4:8:a995:0:a1:759/128
2a02:b48:4000:d:a995:0:1990:b111/128
2a02:b49:4:8:a995:0:1990:b111/128
2a02:b48:4000:d:a995:0:bd09:8934/128
2a02:b49:4:8:a995:0:bd09:8934/128
2a02:b48:4000:d:c7:12:4a9c:100/128
2a02:b49:4:8:c7:12:4a9c:100/128
2a02:b48:4000:d:c7:12:1e4f:100/128
2a02:b49:4:8:c7:12:1e4f:100/128
2a02:b48:4000:d:c7:12:8ee9:100/128
2a02:b49:4:8:c7:12:8ee9:100/128
2a02:b48:4000:d:c7:12:551d:110/128
2a02:b49:4:8:c7:12:551d:110/128

2a02:b48:4000:d:c7:12:551d:109/128
2a02:b49:4:8:c7:12:551d:109/128
2a02:b48:4000:d:c7:12:551d:108/128
2a02:b49:4:8:c7:12:551d:108/128
2a02:b48:4000:d:c7:12:551d:107/128
2a02:b49:4:8:c7:12:551d:107/128
2a02:b48:4000:d:c7:12:551d:106/128
2a02:b49:4:8:c7:12:551d:106/128
2a02:b48:4000:d:c7:12:551d:105/128
2a02:b49:4:8:c7:12:551d:105/128
2a02:b48:4000:d:c7:12:551d:104/128
2a02:b49:4:8:c7:12:551d:104/128
2a02:b48:4000:d:c7:12:551d:103/128
2a02:b49:4:8:c7:12:551d:103/128
2a02:b48:4000:d:c7:12:551d:102/128
2a02:b49:4:8:c7:12:551d:102/128
2a02:b48:4000:d:c7:12:551d:101/128
2a02:b49:4:8:c7:12:551d:101/128
2a02:b48:4000:d:c7:12:551d:100/128
2a02:b49:4:8:c7:12:551d:100/128
2a02:b48:4000:d:c7:12:55eb:105/128
2a02:b49:4:8:c7:12:55eb:105/128
2a02:b48:4000:d:c7:12:55eb:104/128
2a02:b49:4:8:c7:12:55eb:104/128
2a02:b48:4000:d:c7:12:55eb:103/128
2a02:b49:4:8:c7:12:55eb:103/128
2a02:b48:4000:d:c7:12:55eb:102/128
2a02:b49:4:8:c7:12:55eb:102/128
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2a02:b48:4000:d:c7:12:f0a5:f/128
2a02:b49:4:8:c7:12:f0a5:f/128
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2a02:b49:4:8:c7:12:ad3:100/128
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2a02:b49:4:8:c7:12:9fe4:100/128
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INTEROGATORY 4: Please identify and discuss, in detail, the source of all business income streams for Hammy Media LTD. For each, list the relative percentages of each source of income to the gross revenue of Hammy Media LTD.

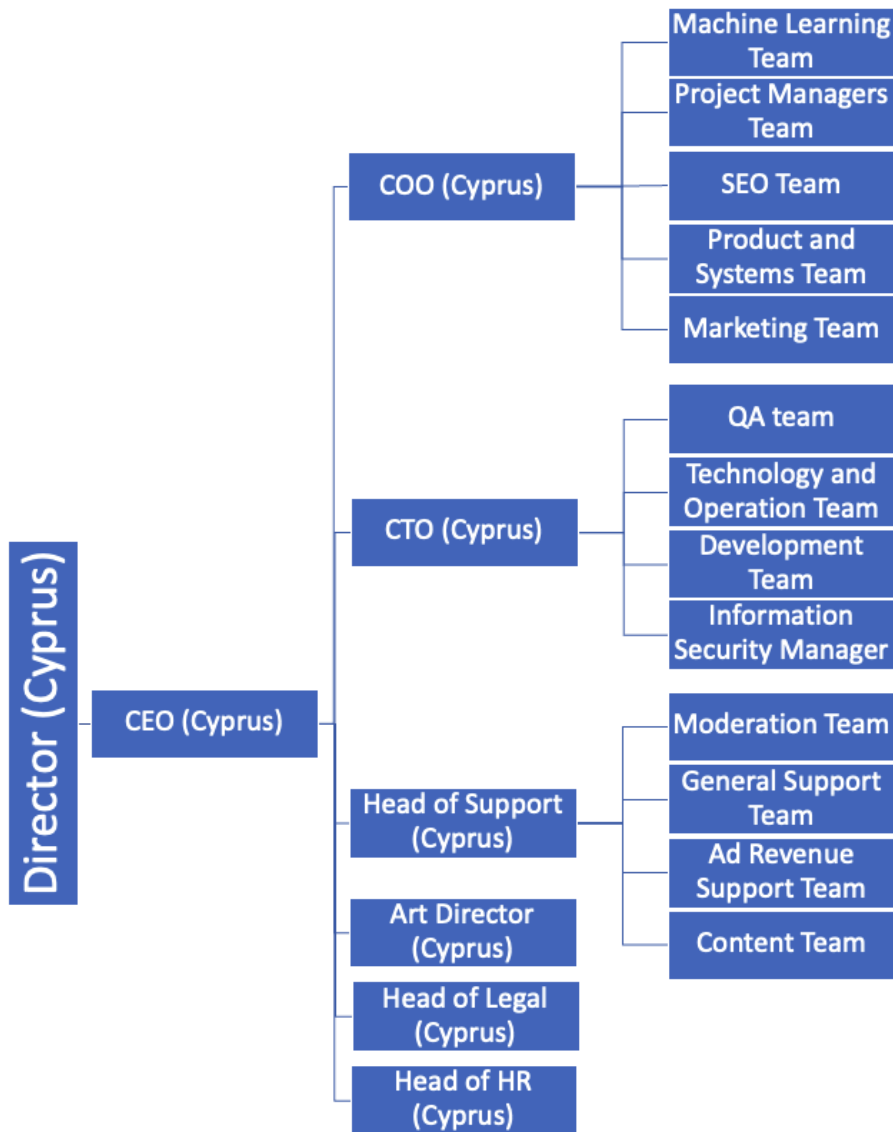
OBJECTION: Hammy objects to this interrogatory as being overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible information. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2023. Subject to this objections, Hammy states as follows.

ANSWER: One hundred percent of Hammy's business income comes from advertising revenue for the xHamster.com website.

INTEROGATORY 5: Please identify and discuss, in detail, the corporate structure for Hammy Media LTD. This includes, but is not limited to, the names, contact information, and address of the individuals who are tasked with making decisions regarding the operation of the company.

OBJECTION: Hammy objects to this interrogatory as being overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible information. Additionally, Hammy objects to the request to provide names and contact information for individuals who live and work outside of the United States, as this request is designed to harass individuals who are not part of this lawsuit and are outside of the jurisdiction of the United States courts. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2023. Subject to this objections, Hammy states as follows.

ANSWER: Please find below the current corporate structure of Hammy Media with the location of all heads of department:



INTEROGATORY 6: Please identify and discuss, in detail, any business affiliation or relationship with Traffic Stars LTD.

OBJECTION: Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2023. Subject to this objections, Hammy states as follows.

ANSWER: Hammy instructed one of its affiliates, Wisebits Ad Net, Ltd., to enter into an agreement with TrafficStars (Hammy will produce this agreement as part of its document

production) whereby for the benefit of Hammy TrafficStars sells advertising to third parties to be placed on the xHamster.com website. As Hammy is just one of thousands of publishers on the TrafficStars platform, Hammy has created an account as a publisher on the TrafficStars platform, just as any other publisher would do. One of the conditions to create such an account is to electronically sign the Terms and Conditions of TrafficStars, the current version of which is available here - <https://trafficstars.com/terms>. Terms and Conditions of Traffic Stars is a contract between Hammy and Traffic Stars Ltd that describes all business relationships between the parties. The contract speaks for itself and Hammy will produce a copy of this contract with its document production.

INTEROGATORY 7: Please identify and discuss, in detail, how advertising revenue is generated on xHamster.com. This includes, but is not limited to, the names, contact information, and address of the individuals who are tasked with making decisions regarding advertisements on xHamster.com.

OBJECTION: Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Additionally, Hammy objects to the request to provide names and contact information for individuals who live and work outside of the United States, as this request is designed to harass individuals who are not part of this lawsuit and are outside of the jurisdiction of the United States courts. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2023. Subject to this objections, Hammy states as follows.

ANSWER:

Please see the response to Interrogatory number 6.

INTEROGATORY 8: For the calendar years 2013-2020, how much advertising revenue was generated on xHamster.com each year?

OBJECTION: Hammy objects to this interrogatory as being overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible information. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2020. Hammy also objects to this interrogatory as being wholly irrelevant to Plaintiffs' actual claims in this litigation and not proportional to the claims against Hammy. Subject to this objections, Hammy states as follows.

ANSWER: The videos at issue in this litigation were only live on the xHamster.com website for a short period of time and were not frequently viewed. Cumulatively, the six videos at issue were only viewed a total of 3,163 times. Advertisements displayed in connection with those videos generated a total of approximately \$1.53 in advertising revenue for Hammy before they were removed from the site.

INTEROGATORY 9: Please identify and discuss, in detail, any business affiliation or relationship with Wisebits LTD.

OBJECTION: Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2023. Subject to this objections, Hammy states as follows.

ANSWER: There are no business affiliations or relationships between Wisebits LTD and Hammy Media LTD.

INTEROGATORY 10: Please identify and discuss, in detail, any business affiliation, relationship, and transactions with Cloudflare, Inc.

OBJECTION: Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2023. Subject to this objections, Hammy states as follows.

ANSWER: Through its affiliate, Wisebits Ad Net, Ltd., Hammy has a contractual relationship with Cloudflare, Inc. whereby Cloudflare, Inc. provides various types of services to Hammy. The contract is based on the template provided by Cloudflare, Inc. and entered into by Cloudflare, Inc. with each customer of Cloudflare, Inc. As far as Hammy knows, there is no possibility to change the terms of the contract with Cloudflare, Inc., nor did Hammy do so. The contract template includes all possible services that Cloudflare, Inc. can provide to customers (even if the customer does not use all of those services), and each customer decides which services they will actually utilize. In other words, just because the Cloudflare contract references a service, does not mean that Hammy received that service from Cloudflare.

Hammy does not use Cloudflare, Inc. for the CDN services for the video content and did not use it for such purposes in 2019-2020. Hammy only uses Cloudflare, Inc. as a proxy server and their DNS services.

INTEROGATORY 11: Please identify and discuss, in detail, the content moderation policy and procedure on the xHamster.com website. This includes, but is not limited to, the names, contact information, and address of the individuals who are tasked with making decisions regarding content moderation.

OBJECTION: Hammy objects to the request to provide names and contact information for individuals who live and work outside of the United States, as this request is designed to harass individuals who are not part of this lawsuit and are outside of the jurisdiction of the United States courts. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2020. Subject to this objections, Hammy states as follows.

ANSWER:

In 2019-2020 our platform had the following moderation process for all content uploaded by users.

1. To upload a video, the uploader had to create an account.
2. Then the uploader needed to go to the special part of the website where it was possible to upload content – the upload page.
3. On that page the uploader had to fill in all the required information and accept the specific upload rules, including a guarantee that the uploaded content is legal.

Each uploaded video was reviewed by our moderation team to verify that the video did not have any inappropriate or illegal content, in accordance with our internal documentation and guidelines.

As for the technical tools used during the moderation process:

1. The Platform had a system which analyzed text related to the content (title, description) for prohibited and suspicious words. Such words were flagged by the system and displayed to the moderation team during the moderation process.
2. The Platform, in collaboration with various leading software providers (for example Google Safety API), detected potentially harmful content. All content after the upload and prior to moderation was processed by such software which allows the platform to initially identify content that may potentially violate the platform's User Agreement. The software enabled the platform to detect inappropriate content using a shared database of digital hashes (fingerprints) and could also detect inappropriate content based on artificial intelligence technologies.

3. The platform used digital fingerprinting technology which has been specifically designed for the platform. In simple words, this software prevented inappropriate content from being re-uploaded. Digital fingerprinting technology compares the hashes (fingerprints) of newly uploaded content with a database of hashes (fingerprints) of previously removed content. If there is a match, this correlation is highlighted for the moderation team and a human-based decision is made about the content.

The upload and moderation process as it existed in 2019-2020 was as follows:

1. To upload a video, the uploader must create an account.
2. Then the uploader needed to go to the special part of the website where it is possible to upload content - the upload page.
3. Fill in all the required information and accept the specific upload rules. Guarantee that the content is legal.
4. The content then went through the moderation process described above except the ID check stage.

INTEROGATORY 12: Please identify and discuss, in detail, data collection on the xHamster.com website. This includes, but is not limited to, the names, contact information, and address of the individuals who are tasked with making decisions regarding data collection.

OBJECTION: Hammy objects to the request to provide names and contact information for individuals who live and work outside of the United States, as this request is designed to harass individuals who are not part of this lawsuit and are outside of the jurisdiction of the United States courts. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2023. Hammy also objects that this interrogatory is unintelligible and unreasonably broad. Subject to this objections, Hammy states as follows.

ANSWER:

All data that the platform collects from users are defined in Privacy Policy which is available here <https://xhamster.com/info/privacy>.

The platform processes different categories of information depending on the type of the interaction the individual has with the platform (all the definitions below can be found in our Privacy Policy - <https://xhamster.com/info/privacy>):

1.1. Information processed by the platform related to Users:

1.1.1. Technical data, including Users' Internet Protocol (IP) address, browser type and version, time zone setting, location, browser plug-in types and versions, smart device information, mobile phone network information, operating system and platform, and other information about the devices Users use to access the website (for more information on how these data are collected, please read our cookie policy at <https://xhamster.com/info/cookie-policy>). This data is collected for statistical purposes, as further described below, and there is no technical capability to personally identify Users with this data;

1.1.2. Usage data, including Users' communication preferences and information about how Users use our website. This may include the services Users viewed or searched for, Users' page response times, download errors, length and number of visits and page interaction information (such as scrolling, clicks, and mouse hovers), as well as the links Users clicked or used, depending on Users's cookie selections. This data is collected for statistical purposes, as described below, and there is no technical capability to identify Users with this data;

1.1.3. User submitted data, including any information Users provide for specific functions, such as communication with us; and

1.1.4. Any consents, permissions, or preferences Users provided to the website.

1.2. Information collected from Members:

1.2.1. All information we collect from Users;

1.2.2. Members username and password;

1.2.3. Members email-address (including the verified or non-verified status of the email address), location (country, region and city), languages, gender, orientation, seeking preferences, and interests (if provided during registration or afterwards in Members' account/profile);

1.2.4. Any post-registration information provided, such as Members' profile photos, birthday, education, sports preferences, and other information that Members may indicate using the interface of Members' account/profile;

1.2.5. Members' favorites, comments, personal messages, logging information, likes etc., if applicable;

1.2.6. Marketing information, including preferences in receiving marketing from us and third parties. For marketing purposes, we may also automatically record information about Members' usage of the Website, including actions taken, date and time, network connectivity, and performance information related to logins, clicks, and other feature usage and marketing-related information;

1.2.7. Communications, including information Members share with us or exchange with other users of the platform;

1.3. Information collected from Verified Members:

1.3.1. All information we collect from Users and Members, where applicable;

1.3.2. Copy of Verified Members' ID document (which can be national ID, national passport, international passport, citizenship card, state ID, driver's license (only for countries where a national ID or passport is not mandatory));

1.3.3. Verified Members' picture (photo), visual appearance, date of birth, and place of residence;

1.3.4. Information related to payments (payment information), methods of payments and balance of Verified Members' account, status, date, and provider of payments;

1.3.5. Any submitted data, including data Verified Members choose to share on the Website, such as Verified Members' feedback, any written content, agreements, extracts, identification documents, images, videos, or other content or media.

1.4. Information collected from Partners:

1.4.1. All personal data we collect from Users, Members, and Verified Members, where applicable;

1.4.2. Financial data, including payment information and selected payment method;

1.4.3. Personal data Partners provide for a specific function, for instance Partners' contact information and address.

1.5. Different countries, governments, and states may have different laws and regulations that may require Users to confirm the age of majority before accessing the website or using special part of the website. In such cases, we may process Users' biometric data (where applicable and where the chosen method of confirmation of Users' age requires the provision of such data).

INTEROGATORY 13: Please identify and discuss, in detail, data analysis on the xHamster.com website. This includes, but is not limited to, the names, contact information, and address of the individuals who are tasked with making decisions regarding data analysis.

OBJECTION: Hammy objects to the request to provide names and contact information for individuals who live and work outside of the United States, as this request is designed to harass individuals who are not part of this lawsuit and are outside of the jurisdiction of the United States courts. Hammy also objects that this interrogatory is unintelligible and unreasonably broad. Subject to this objections, Hammy states as follows. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2023.

ANSWER:

All the purposes for which personal data is collected and all legal grounds under which the platform processes personal data are defined in the Privacy Policy, available here <https://xhamster.com/info/privacy>.

1. The personal data is being processed for the below purposes:

1.1. Provision of the services as defined on the Website and in the Terms and Conditions

We process individuals' personal data when necessary to present our Website, its features and to provide individuals with the content and services individuals request in accordance with our Terms and Conditions.

1.2. Account management

We process individuals personal data to manage individuals' account, offer customer support, and send individuals important notifications about individuals' account. We also use this information to provide any system and security notifications including informing individuals of any changes to our Platform or services that may affect individuals.

1.3. Communication

We process individuals' personal data to send individuals periodic emails to inform individuals of any similar services that we offer that may be of interest to individuals.

1.4. User Support

We process individuals' personal data to provide customer support and address individuals' inquiries or any issues individuals might experience.

1.5. Personalization

Individuals' personal data may be processed to personalize individuals' experience, such as recommending videos or content based on individuals' preferences and viewing history.

1.6. Analytics and Improvement

Individuals' personal data may be processed to improve the platform's functionality, to determine whether individuals of the Website are unique, or whether the same individual is using the Website on multiple occasions. We also use this to monitor aggregate metrics such as the total number of visitors, pages viewed, and demographic patterns.

1.7. Research and Development

Data may be anonymized and aggregated for research and development purposes, such as identifying trends and improving the platform's features. Data may also be used to develop new services on our Website as well as to analyze and target new markets.

1.8. Security

We process individuals' personal data to enhance platform security, including detecting and preventing fraud, spam, and unauthorized access. We may also process individuals' personal data where it is necessary in order to diagnose or fix technology issues, and to detect, prevent and respond to actual or potential fraud, illegal activities, or intellectual property infringements.

1.9. Advertising and Marketing

Individuals' personal data may be processed for targeted advertising and marketing purposes.

1.10. Payment Processing

If individuals are a Verified Member or Partner, individuals' personal information will be processed for billing and payment purposes.

1.11. Legal Compliance and risk management

Individuals' personal data may be processed in compliance with various legal regulations in order to meet legal obligations and conduct risk assessments.

1.12. Responding to legal authorities' requests

Individuals' personal data may be processed in order to provide assistance to competent authorities in their investigations, civil claims, criminal proceedings or prosecutions in accordance with official orders and requests.

2. What is our legal basis for processing individuals' personal data

We process individuals' personal data if one of the following applies:

2.1. When individuals have given individuals' consent (Article 6(1)(a) of the GDPR):

2.1.1. We may request individuals' consent to process individuals' information for specific purposes. In such cases, individuals will have the right to withdraw individuals' consent at any time.

2.2. Where it is necessary for the performance of a contract (Article 6(1)(b) of the GDPR), including:

2.2.1. Execution of the Terms and Conditions / User Agreement and any other contract we may have with individuals;

2.2.2. Storing and hosting of individuals' uploaded video content;

2.2.3. Providing access to individuals' video content to the platform's users;

2.2.4. Making individuals' video content available to the general public;

2.2.5. Processing individuals' payment information for payment administration, if applicable.

2.3. When complying with our legal obligations (Article 6(1)(c) of the GDPR):

We are required to comply with certain legal obligations which may involve the processing of individuals' personal data. These obligations may include:

2.3.1. Storing individuals' payment information for tax and/or audit purposes;

2.3.2. Addressing any legal claims, disputes, or investigations related to individuals or to individuals' video content;

2.3.3. Complying with requests for information received from competent authorities, law enforcement authorities, or government authorities;

2.3.4. Performing checks and complying with laws relating to fraud prevention;

2.3.5. Verifying individuals' legal age.

2.4. When protecting the vital interests of any individual (Article 6(1)(d) of the GDPR):

2.4.1. We may process personal data to protect the vital interests of individuals, such as in emergency situations where someone's life or physical integrity might be at risk.

2.5. When it is necessary for the purposes of the legitimate interests (Article 6(1)(f) of the GDPR), we pursue:

2.5.1. Providing, maintaining, and improving our services;

2.5.2. Developing new features;

2.5.3. Monitoring, maintaining and improving internal business processes and services;

2.5.4. Sending individuals details of similar services we provide;

2.5.5. Providing marketing communications;

2.5.6. Identifying infringements of our Terms and Conditions;

2.5.7. Analyzing and evaluating the video content for quality control and compliance monitoring;

2.5.8. Ensuring network information security, including monitoring individuals' access to our information technology for the purpose of preventing cyber-attacks, unauthorized use of the Website, and prevention or detection of crime;

2.5.9. Detecting or preventing fraud, abuse, security, or technical issues with our services;

2.5.10. Reporting to or cooperating with government authorities and organizations;

2.5.11. Responding to any queries, requests, or technical issues;

2.5.12. Protecting our legal rights and interests (including when receiving any legal claims);

2.5.13. Monitoring the performance and effectiveness of our services and the Website;

2.5.14. Assessing the quality of the provided services.

2.6. When interacting with the Website and using all available features of the Website, individuals may choose to voluntarily provide special categories of personal data to us. The processing of individuals' special categories of personal data will be carried out on the legal basis and for the purposes set out in the following paragraphs.

2.7. When individuals have provided individuals' explicit consent (Article 9(2)(a) of the GDPR):

2.7.1. Using the Website may result in the disclosure of special categories of personal data if individuals voluntarily choose to disclose such data. We want to emphasize that our role in this process is solely that of an intermediary. While we facilitate the Website and Services, individuals bear sole responsibility for individuals' actions when using the Website and Services and the disclosure of special categories of personal data.

2.7.2. Furthermore, during the registration process individuals may be asked to indicate some of individuals' special categories of personal data. During the registration process and in the event that individuals enter into a specific agreement with us (if applicable), individuals will be requested to give individuals' explicit consent to the processing of such special categories of personal data, while acknowledging that individuals are solely responsible for making such information publicly available.

2.8. When individuals manifestly made individuals' special categories of personal data publicly available (Article 9(2)(e) of the GDPR).

2.8.1. Individuals further understand that by registering on our Website and providing special categories of personal data, individuals are making individuals' special categories of personal data manifestly public, if the Website provides such functionality. This explicit intention to make individuals' information manifestly public, coupled with the fact that individuals voluntarily provide the special categories of personal data themselves, constitutes an additional legal basis allowing the processing of such information.

2.9. Defense of legal claims (Article 9(2)(f) of the GDPR):

2.9.1. Individuals' special categories of personal data will be processed where it is necessary for the establishment, exercise, or defense of legal claims.

INTEROGATORY 14: For the calendar years 2013-2020, how many individual videos have been included in the category "Voyeur/Public Nudity?"

OBJECTION: Hammy objects to this interrogatory as being overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible information. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2020. Hammy also objects to this interrogatory as being wholly irrelevant to Plaintiffs' actual claims in this litigation and not proportional to the claims against Hammy. Subject to this objections, Hammy states as follows.

ANSWER:

1. Please note that there is no technical possibility to retrieve data on the number of videos in each category in 2019. Therefore, all numbers are given for the end of 2020.

2. Also, the calculation will reflect all publicly available videos for the end of 2020, regardless of when the video became publicly available. This means that if the video was published in 2013, for example, and was available on the platform at the end of 2020, that video will be counted.

In light of the above clarification, please find below numbers of videos on the requested categories:

voyeur: 9784 - 0.18% of the total number of videos available on the platform by the end of 2020

public nudity: 22315 - 0.41% of the total number of videos available on the platform by the end of 2020

INTEROGATORY 15: During the relevant time period, how many videos have had titles, categories, or tags that included the words “voyeur,” “cam,” “camera,” “hidden,” “spy,” “secret,” “locker room,” “shower,” “South Carolina,” or “public nudity?”

OBJECTION: Hammy objects to this interrogatory as being overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible information. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2020. Hammy also objects to this interrogatory as being wholly irrelevant to Plaintiffs’ actual claims in this litigation and not proportional to the claims against Hammy. Subject to this objections, Hammy states as follows.

ANSWER:

1. Please note that there is no technical possibility to retrieve data on the number of videos in each category in 2019.

Therefore, all numbers are given for the end of 2020.

2. Also, the calculation will reflect all publicly available videos for the end of 2020, regardless of when the video became publicly available. This means that if the video was published in 2013, for example, and was available on the platform at the end of 2020, that video will be counted.

In light of the above clarification, please find below numbers of videos on the requested categories:

voyeur: 35635 - 0.66% of the total number of videos available on the platform by the end of 2020

cam: 102275 - 1.9% of the total number of videos available on the platform by the end of 2020

camera: 24693 - 0.46% of the total number of videos available on the platform by the end of 2020

hidden: 6418 - 0.12% of the total number of videos available on the platform by the end of 2020

spy: 3498 - 0.06% of the total number of videos available on the platform by the end of 2020

secret: 7675 - 0.14% of the total number of videos available on the platform by the end of 2020

locker room: 6935 - 0.13% of the total number of videos available on the platform by the end of 2020

shower: 35858 - 0.67% of the total number of videos available on the platform by the end of 2020

South Carolina: 28 - 0.00052% of the total number of videos available on the platform by the end of 2020

public nudity: 23088 - 0.43% of the total number of videos available on the platform by the end of 2020

INTEROGATORY 16: During the relevant time period, how many videos have been associated with categories, keywords, or search terms that included the words “voyeur,” “cam,” “camera,” “hidden,” “spy,” “secret,” “locker room,” “shower,” “South Carolina,” or “public nudity?”

OBJECTION: Hammy objects to this interrogatory as being overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible information. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2020. Hammy also objects to this interrogatory as being wholly irrelevant to Plaintiffs' actual claims in this litigation and not proportional to the claims against Hammy. Subject to this objections, Hammy states as follows.

ANSWER:

1. Please note that there is no technical possibility to retrieve data on the number of videos in each category in 2019.

Therefore, all numbers are given for the end of 2020.

2. Also, the calculation will reflect all publicly available videos for the end of 2020, regardless of when the video became publicly available. This means that if the video was published in 2013, for example, and was available on the platform at the end of 2020, that video will be counted.

In light of the above clarification, please find below numbers of videos on the requested categories:

voyeur: 36156 - 0.67% of the total number of videos available on the platform by the end of 2020

cam: 352738 - 6.55% of the total number of videos available on the platform by the end of 2020

camera: 26586 - 0.49% of the total number of videos available on the platform by the end of 2020

hidden: 6487 - 0.12% of the total number of videos available on the platform by the end of 2020

spy: 18430 - 0.34% of the total number of videos available on the platform by the end of 2020

secret: 18709 - 0.35% of the total number of videos available on the platform by the end of 2020

locker room: 6997 - of the total number of videos available on the platform by the end of 2020

shower: 37537 - 0.13% of the total number of videos available on the platform by the end of 2020

South Carolina: 30 - 0.00053% of the total number of videos available on the platform by the end of 2020

public nudity: 23097 - 0.43% of the total number of videos available on the platform by the end of 2020

INTEROGATORY 17: For the relevant time period, please identify and discuss, in detail, how content on the xHamster.com website was reported as objectionable by users or the general public for any reason. This includes, but is not limited to, the names, contact information, and address of the individuals who are tasked with making decisions regarding the reporting process and how this process changed over the relevant time period.

OBJECTION: Hammy objects to this interrogatory as being overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible information. Additionally, Hammy objects to the request to provide names and contact information for individuals who live and work outside of the United States, as this request is designed to harass individuals who are not part of this lawsuit and are outside of the jurisdiction of the United States courts. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2023. Hammy also objects to this interrogatory as being wholly irrelevant to Plaintiffs' actual claims in this litigation and not proportional to the claims against Hammy. Subject to this objections, Hammy states as follows.

ANSWER:

After the video is published, aside from our platform moderation procedure (that was described earlier), we provide our users with several ways to inform the platform of any issues or concerns they may have regarding any type of content available on the platform. This process (or, rather, a communication channel) is our platform reporting process. This process creates a constant post-publishing moderation procedure for the published content.

Users can submit a request/report about the content in the following ways:

- a) Each piece of content is accompanied by a flag button, in order for our users to have an efficient and easy way to express their concerns about the content.
- b) Users can express their concerns about the content directly to our support team under the respective subject in our contact form - <https://xhamster.com/info/contact?subject=abuse>.
- c) Users can notify us of any alleged copyright infringement on the platform by using the special subject in our contact form - <https://xhamster.com/info/contact?subject=dmca>.
- d) Users may send all their concerns about the content directly to our support team via the general e-mail of the support team, namely - help@xhamster.com.

After a user informs the platform about any issues or concerns they may have regarding any type of content available on the platform (submitting a report), such report is received by our moderation team.

As a general rule and method used in our reporting process, upon receiving reports concerning any content available on the platform from our users or from any third party, our moderators proceed with such content re-evaluation, and if the said content is deemed inappropriate or in violation of our Terms and Conditions, it will be immediately removed from the platform.

In addition to our Terms and Conditions, we've developed and implemented specific internal guidelines for the moderation team regarding what is and is not considered inappropriate content. These guidelines are used for the moderation and reporting processes.

INTEROGATORY 18: For the relevant time period, please identify and discuss, in detail, Hammy Media's policy and procedures for handling reports that content on the xHamster.com website was made or distributed without consent. This includes, but is not limited to, the names, contact information, and address of the individuals who are tasked with making decisions regarding the reporting policies and procedures and how the process has changed over the relevant time period.

OBJECTION: Hammy objects to this interrogatory as being overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible information. Additionally, Hammy objects to the request to provide names and contact information for individuals who live and work outside of the United States, as this request is designed to harass individuals who are not part of this lawsuit and are outside of the jurisdiction of the United States courts. Hammy also objects to this interrogatory as being wholly irrelevant to Plaintiffs' actual claims in this litigation and not proportional to the claims against Hammy. Additionally, Hammy objects to the time frame for this interrogatory as defined by the Plaintiffs. Accordingly, any response to this interrogatory is limited to the relevant time period of 2019-2023. Subject to this objections, Hammy states as follows.

ANSWER:

Users are able to submit a report about the content in the following ways:

- a) Each piece of content is accompanied by a flag button, in order for our users to have an efficient and easy way to express their concerns about the content.
- b) Users can express their concerns about the content directly to our support team under the respective subject in our contact form - <https://xhamster.com/info/contact?subject=abuse>.

c) Users can notify us of any alleged copyright infringement on the platform by using the special subject in our contact form - <https://xhamster.com/info/contact?subject=dmca>.

d) Users may send all their concerns about the content directly to our support team via the general e-mail of the support team, namely - help@xhamster.com.

After a user informs the platform about any issues or concerns they may have regarding any type of content available on the platform (submitting a report), such report is received by our moderation team.

As a general rule and method used in our reporting process, upon receiving reports concerning any content available on the platform from our users, our moderators proceed with such content re-evaluation, and if the said content is deemed inappropriate or in violation of our Terms and Conditions, it will be immediately removed from the platform. Re-evaluation is made in accordance with specific internal guidelines for the moderation team regarding what is and is not considered inappropriate content.

If the report includes any additional information or requests from users, additional teams may be engaged in the report resolution (legal team or any relevant team, depending on the nature of the request).

Signed under the pains and penalties of perjury this 31st day of January, 2024



Mardiros Haladjian,
Hammy Media, Ltd.

Signed as to objections only:

Hammy Media, Ltd.

By its attorneys:

Evan Fray-Witzer, Esq,
Valenin Gurvits, Esq.